

Risk Based Inspection Public Meeting – Production Volume

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General Comments

- Today's comments reflect the consensus of a broad-based coalition of meat and poultry associations that collectively represent the vast majority of federally inspected establishments of all sizes ("Industry").
- Industry supports the concept of a risk-based approach to the allocation of inspection resources
- Industry supports the transparent and open process for developing the plan
- Industry appreciates the opportunity to share our views on incorporation of production volume into the RBI algorithm

Issues Specific to Volume

- We believe it is inappropriate for an establishment that is effectively controlling food safety hazards to be penalized by an RBI system just because it is a high-volume producer
- Conversely, we do not want to see a poor performing establishment rewarded with a lower intensity of inspection for no other reason than that it is a low volume establishment

- The agency's previously released RBI algorithm inserted volume in such a way as to significantly penalize large establishments, even when they were effectively controlling food safety hazards.

Original Model Ground Beef Plant

	Est. A	Est. B
Inherent Product Hazard (2 to 20)	20	20
Volume Range	1	5
Inherent Risk Measure	20	100
NR Data (0 to 5)	5	0
Verified F.S. Complaint (0 to 3)	2	0
F.S. Recall (0 to 6)	3	0
Enforcement (0 to 6)	3	0
Salmonella (0 to 3)	3	0
Pathogen Testing (0 to 9)	9	0
RTE Alternative	NA	NA
Total (0 to 32)	25	0
Risk Control Measure	78	0
RBI Risk Measure	49	50

- By including production volume as a component of “inherent” risk, large volume establishments, as shown in our example, can never demonstrate enough control on the RCM side of the equation to overcome the high inherent risk measure (IRM).

- The agency's RBI algorithm, as presented to date, includes three major factors: 1) product inherent risk, as determined through the expert elicitation; 2) establishment production volume (originally included in the product inherent risk component); and 3) establishment's risk control measure (RCM).
- Industry believes that in the risk-based inspection algorithm, an establishment's control of its processes and food safety hazards (i.e., establishment risk control) should be the primary determining factor in assigning an RBI score, and the other factors should be weighted accordingly in the algorithm.

- RCM is the only factor over which the establishment has control (or fails to control), and it is the only factor that will be influenced by increased intensity of inspection. Therefore, it seems to be the factor that should be weighted most heavily in the algorithm.

Risk Based Inspection “Nona Compromise”

